

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

BOBBY HARDRICK,

Plaintiff,

v.

**WELLS FARGO BANK NATIONAL
ASSOCIATION; RESOLVION, LLC;
KEEL RECOVERY, INC.,**

Defendants.

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CIVIL ACTION NO. 3:24-cv-00014-D

JURY

**DEFENDANT WELLS FARGO BANK NATIONAL ASSOCIATION'S
MOTION TO SUBSTITUTE COUNSEL**

Defendant Wells Fargo Bank National Association (“Wells Fargo” or “Defendant”) files this Motion to Substitute Counsel (“Motion”) and respectfully shows the Court as follows:

1. Robert T. Mowrey, Matthew K. Hansen, and Caroline H. Boone of Locke Lord LLP are currently counsel of record for Defendant in this lawsuit.

2. Defendant has now retained the following attorneys to represent it in this matter:

Raymond M. Kutch

State Bar No. 24072195

rkutch@thompsoncoe.com

George Arnold

State Bar No. 00783559

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THOMPSON, COE, COUSINS & IRONS, LLP

4400 Post Oak Parkway, Suite 1000

Houston, Texas 77027

Telephone: (713) 403-8210

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and

Matthew J. Kolodoski
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3. Defendant, therefore, requests that Mr. Kutch, Mr. Arnold, and Mr. Kolodoski of Thompson, Coe, Cousins & Irons, LLP be substituted in and designated as its attorneys of record, with Mr. Kutch designated as lead attorney. Defendant also requests that Mr. Mowrey, Mr. Hansen, and Ms. Boone of Locke Lord LLP be withdrawn as counsel. Defendant requests that the Court and counsel direct all correspondence going forward to Mr. Kutch, Mr. Arnold, and Mr. Kolodoski of Thompson, Coe, Cousins & Irons, LLP.

4. Granting this Motion will not harm or prejudice Plaintiff at this early stage in the case.

5. This Motion is for good cause and is not sought for delay but so that justice may be done.

WHEREFORE, Defendant prays that this Motion be granted, that Mr. Kutch, Mr. Arnold, and Mr. Kolodoski of Thompson, Coe, Cousins & Irons, LLP be substituted in for Mr. Mowrey, Mr. Hansen, and Ms. Boone of Locke Lord LLP. Defendant also prays for such other and further relief, both legal and equitable, to which it is justly entitled.

Respectfully submitted,

By: /s/ Raymond M. Kutch

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WITHDRAWING ATTORNEYS

/s/ Robert T. Mowrey

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**ATTORNEYS FOR DEFENDANT
WELLS FARGO BANK
NATIONAL ASSOCIATION**

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing document on all counsel and parties of record in accordance with the Federal Rules of Civil Procedure via the Court's electronic service on May 15, 2024.

/s/ Raymond M. Kutch

Raymond M. Kutch